

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANK LONG, JOSEPH SHIPLEY,
MICHAEL WHITE, and RAMEE
GARNETT, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SOUTHEASTERN PENNSYLVANIA
TRANSPORTATION AUTHORITY,

Defendant.

Case No. 2:16-cv-1991-PBT

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASSES, APPOINTMENT OF CLASS COUNSEL, AND
APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Classes, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement ("Motion for Preliminary Approval") and in the Declaration of Ossai Miazad in Support of Plaintiffs' Motion for Preliminary Approval ("Miazad Decl."), and the supporting exhibits thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Settlement Agreement and Release, attached as **Exhibit A** to the Miazad Decl.;
- (2) conditionally certifying the proposed Classes pursuant to Rule 23 of the Federal Rules of Civil Procedure;
- (3) preliminarily appointing Plaintiffs Frank Long, Joseph Shipley, and Michael White as Class Representatives;

- (4) appointing Plaintiffs' Counsel as Class Counsel; and
- (5) approving the proposed Notice of Class Action Settlement and Claim Form, attached as **Exhibit B** and **Exhibit C** to the Miazad Decl.

* * *

Plaintiffs also submit a Proposed Order, attached to the Miazad Decl. as **Exhibit G**, for the Court's convenience.

Dated: January 15, 2021
New York, New York

Respectfully submitted,

/s/ Ossai Miazad
OUTTEN & GOLDEN LLP
Ossai Miazad
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Classes, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement was served on this 15th day of January, 2021, upon counsel of record via the Court's ECF filing system.

/s/ Ossai Miazad
Ossai Miazad